JAP:TAP

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

16 M 1029

- - - - - - - - - - - - - - - X

UNITED STATES OF AMERICA

- against -

FAWAZ OLARENWAJU ANIMASAUN,

Defendant.

- - - - - - - - - - - - - - - X

REMOVAL TO THE EASTERN DISTRICT OF TEXAS

Fed. R. Crim. P. 5

EASTERN DISTRICT OF NEW YORK, SS:

GREG CHRISTIANSEN, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about June 15, 2016, an arrest warrant was issued by the United States District Court for the Eastern District of Texas commanding the arrest of defendant FAWAZ OLARENWAJU ANIMASAUN for conspiracy to commit bank fraud and wire fraud, in violation of 18 U.S.C. § 1349, bank fraud and aiding and abetting, in violation of 18 U.S.C. § 1344 and 2, and aggravated identity theft and aiding and abetting, in violation of 18 U.S.C. § 1028A.

The source of your deponent's information and the grounds for his belief are as follows:[1]

1. I am a case agent involved in the underlying investigation in Texas.

[1] Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. On or about June 15, 2016, a grand jury sitting in the Eastern District of Texas returned an indictment charging the defendant with conspiracy to commit bank fraud and wire fraud, in violation of 18 U.S.C. § 1349, bank fraud and aiding and abetting, in violation of 18 U.S.C. § 1344 and 2, and aggravated identity theft and aiding and abetting, in violation of 18 U.S.C. § 1028A and 2. On the same day, a warrant for the arrest of the defendant FAWAZ OLARENWAJU ANIMASAUN was issued by the United States District Court for the Eastern District of Texas in connection with the indictment. A copy of the warrant and indictment is attached hereto as Exhibit A.

3. On November 16, 2016, at approximately 4:00 pm the defendant FAWAZ OLARENWAJU ANIMASAUN arrived at John F. Kennedy International Airport in Queens, New York, aboard Delta Flight 9348 from the Netherlands (and before that Delta Flight 9373 from Ghana). Customs and Border Protection ("CBP") referred the defendant to secondary screening and contacted HSI. The defendant was arrested at the airport. I reviewed the defendant's passport photograph and other pedigree information and determined that the defendant was the individual sought by the Eastern District of Texas.

4. WHEREFORE, your deponent respectfully requests that the defendant FAWAZ OLARENWAJU ANIMASAUN be removed to the Eastern District of Texas so that he may be dealt with according to law.

Greg Christiansen
Special Agent, United States Department of Homeland Security, Homeland Security Investigations

Sworn to before me this
17th day of November, 2016

s/ Reyes

THE HONOR JR
UNITED STA E
EASTERN DI

FID: 10102194

AO 442 (Rev. 10/03) Warrant for Arrest

UNITED STATES DISTRICT COURT

EASTERN District of TEXAS

UNITED STATES OF AMERICA

V.

FAWAZ OLARENWAJU ANIMASAUN
1 BABS ANIMASHAUN STREET
SURULERE, LAGOS, NIGERIA

SEALED

WARRANT FOR ARREST

Case Number: 6:16CR35-01

2016 JUN 16 PM 1:02

RECEIVED
UNITED STATES MARSHAL
EASTERN DIST. OF TEXAS

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest FAWAZ OLARENWAJU ANIMASAUN

Name

and bring him or her forthwith to the nearest magistrate judge to answer a(n)

☑ Indictment ☐ Information ☐ Complaint ☐ Order of court ☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice

charging him or her with (brief description of offense)

COUNT 1: 18 USC 1349 - CONSPIRACY TO COMMIT BANK FRAUD AND WIRE FRAUD
COUNTS 2-3: 18 USC 1344 AND 2 - BANK FRAUD AND AIDING AND ABETTING
COUNTS 4 AND 5: 18 USC 1028A AND 2 - AGGRAVATED IDENTITY THEFT AND AIDING AND ABETTING

ALIASES: RICHARDSON6567, LANRAY LARRY, LARRY HOOVER, SLIM HUSSTLE OLANRAYWAJU

in violation of Title ____________ United States Code, Section(s) ____________

UNITED STATES DISTRICT COURT * EASTERN DISTRICT OF TEXAS *

DAVID A. O'TOOLE
Name of Issuing Officer

David A. O'Toole
Signature of Issuing Officer

CLERK
Title of Issuing Officer

6/15/16 Tyler
Date Location

RETURN

This warrant was received and executed with the arrest of the above-named defendant at

DATE RECEIVED	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
DATE OF ARREST		

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. 6:16CR 35 -01

Matter Sealed: ☐ Juvenile ☑ Other than Juvenile

☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added
☐ Indictment ☐ Charges/Counts Added
☐ Information

USA vs. SEALED

Defendant: Fawaz Olarenwaju Animasaun

Address: 1 Babs Animashaun Street
Surulere, Lagos, Nigeria

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
JUN 15 2016
BY
DEPUTY

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT DISTRICT OF TEXAS — Eastern District — Divisional Office

Name and Office of Person Furnishing Information on THIS FORM: Nathaniel Kummerfeld
☑ U.S. Atty ☐ Other U.S. Agency
Phone No.

Name of Asst. U.S. Attorney (if assigned): Nathaniel Kummerfeld

☐ Interpreter Required Dialect

Birth Date: 4/13/1990

☑ Male ☐ Female

☑ Alien (if applicable)

Social Security Number

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
HSI Special Agent Greg Christiansen

☐ person is awaiting trial in another Federal or State Court (give name of court)

☐ this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:
☐ U.S. Atty ☐ Defense

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

☐ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAG. JUDGE CASE NO.

Place of offense: Cherokee County

DEFENDANT

Issue: ☑ Warrant ☐ Summons

Location Status:

Arrest Date ________ or Date Transferred to Federal Custody ________

☐ Currently in Federal Custody
☐ Currently in State Custody
☐ Writ Required
☐ Currently on bond
☐ Fugitive

Defense Counsel (if any): ________

☐ FPD ☐ CJA ☐ RET'D
☐ Appointed on Target Letter

☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Felony - Count 1 = 18 U.S.C. § 1349 (Conspiracy to Commit Bank Fraud and Wire Fraud);
Felony - Counts 2 - 3 = 18 U.S.C. §§ 1344 and 2 (Bank Fraud and Aiding and Abetting);
Felony - counts 4 - 5 = 18 U.S.C. §§ 1028A and 2 (Aggravated Identity Theft and Aiding and Abetting)

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS
JUN 15 2016
BY
DEPUTY

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

SEALED

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 6:16CR35
	§	JUDGE MHS/KNM
FAWAZ OLARENWAJU ANIMASAUN (01)	§	
a/k/a RICHARDSON6567	§	
a/k/a LANRAY LARRY	§	
a/k/a LARRY HOOVER	§	
a/k/a SLIM HUSSTLE OLANRAYWAJU	§	
IDOWU TEMITOPE OMOLADE (02)	§	
a/k/a CLICKIDONLINE	§	
a/k/a ID	§	
a/k/a HIGHDEE	§	
a/k/a MICHAEL CHERNICK	§	
a/k/a CHERNICK.MICHAEL	§	

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

General Allegations

At all times relevant to this Indictment:

1. Austin Bank was a "financial institution," as defined by Title 18, United States Code, Section 20. It was based in Jacksonville, Texas, within the Eastern District of Texas.

2. UMB Bank, N.A., was a "financial institution," as defined by Title 18, United States Code, Section 20. It was based in Kansas City, Missouri, within the Western District of Missouri.

3. UMB Financial Corporation (UMB) was a financial services company based Kansas City, Missouri, within the Western District of Missouri.

4. Northern Trust, N.A., was a "financial institution," as defined by Title 18, United States Code, Section 20. It was based in Miami, Florida, within the Southern District of Florida.

5. Northern Trust Corporation (Northern Trust) was a financial services company based Chicago, Illinois, within the Northern District of Illinois.

6. Wells Fargo Bank, N.A. (Wells Fargo), was a "financial institution," as defined by Title 18, United States Code, Section 20. It was based in Sioux Falls, South Dakota, within the District of South Dakota.

7. Malayan Banking Berhad (Maybank) was a foreign bank based in Kuala Lumpur, Malaysia.

8. CIMB Bank (CIMB) was a foreign bank based in Kuala Lumpur, Malaysia.

9. **Fawaz Olarenwaju Animasaun (Animasaun) a/k/a Richardson6567 a/k/a Lanray Larry a/k/a Larry Hoover a/k/a Slim Husstle Olanraywaju** resided in or around Lagos, Nigeria.

10. **Idowu Temitope Omolade (Omolade) a/k/a Clickidonline a/k/a ID a/k/a Highdee a/k/a Michael Chernick a/k/a Chernick.Michael** resided in or around Lagos, Nigeria and Kuala Lumpur, Malaysia.

COUNT 1

Violation: 18 U.S.C. § 1349
(Conspiracy to Commit Bank
Fraud and Wire Fraud)

1. The General Allegations section of this indictment is realleged and incorporated by reference as though fully set forth herein.

2. From in or about April 2012, and continuing through in or about August 2012, the exact dates being unknown to the Grand Jury, in the Eastern District of Texas, and elsewhere, the defendants, **Fawaz Olarenwaju Animasaun a/k/a Richardson6567 a/k/a Lanray Larry a/k/a Larry Hoover a/k/a Slim Husstle Olanraywaju** and **Idowu Temitope Omolade a/k/a Clickidonline a/k/a ID a/k/a Highdee a/k/a Michael Chernick a/k/a Chernick.Michael**, along with others both known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree to violate 18 U.S.C. § 1344, bank fraud, that is to execute and attempt to execute a scheme and artifice to obtain money, funds, assets, securities, and other property owned by and under the custody and control of an insured financial institution by means of materially false and fraudulent pretenses, representations, and promises, and 18 U.S.C. § 1343, wire fraud, that is to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce any writings, signs, signals, pictures, and sounds for the purpose of executing a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises.

Purpose of the Conspiracy

3. It was the general purpose of the conspiracy for the defendants and their co-conspirators to unlawfully obtain money through unauthorized transfers of funds from bank accounts and brokerage accounts.

Manner and Means of the Conspiracy

The manner and means by which the defendants and their co-conspirators sought to accomplish the objects and purpose of the conspiracy included, among others, the following:

4. To achieve the goals of the conspiracy, the defendants and their co-conspirators devised and carried out a scheme to obtain money and property by means of false and fraudulent pretenses, representations, and promises from financial institutions and financial services companies.

5. **Omolade** and other co-conspirators, using false names, including but not limited to "Michael Chernick," communicated by email and Internet instant messaging, with individuals within the United States ("money mules") in order to secure their assistance in transferring stolen funds.

6. **Animasaun** and other co-conspirators identified bank accounts and brokerage accounts ("target accounts") which contained funds that they intended to steal.

7. **Animasaun** and other co-conspirators communicated by email with personnel at the financial institutions and financial services companies.

8. During their communications with personnel at the financial institutions and financial services companies, **Animasaun** and other co-conspirators impersonated the actual account holders of the target accounts, harvested details about the target accounts, including account balances, and obtained wire transfer instructions.

9. **Animasaun** and other co-conspirators instructed personnel at the financial institutions and financial services companies to initiate wire transfers without the actual account holders' knowledge or authorization.

10. **Animasaun** kept **Omolade** apprised of communications with personnel at the financial institutions and financial services companies and, at various times, advised him to expect specific incoming wire transfers to the money mules' accounts.

11. Money mules, acting at the direction of **Omolade** and other co-conspirators, received incoming wire transfers and initiated outgoing wire transfers as directed.

Overt Acts

In furtherance of the conspiracy and to achieve its objects and purpose, the following overt acts, among others, were committed in the Eastern District of Texas and elsewhere:

12. On or about April 10, 2012, **Animasaun** caused UMB to execute a wire transfer in the amount of $27,871.00 from a UMB account ending in 6823 into a Wells Fargo account ending in 4392 without P.D.'s knowledge or authorization.

13. On or about April 12, 2012, **Omolade** caused the holder of the Wells Fargo account ending in 4392 to execute a wire transfer in the amount of $26,000.00 into a Maybank account ending in 8633.

14. On or about April 16, 2012, **Animasaun** caused UMB to execute a wire transfer in the amount of $28,073.00 from a UMB account ending in 6823 into a Wells Fargo account ending in 4392 without P.D.'s knowledge or authorization.

15. On or about April 16, 2012, **Omolade** caused the holder of the Wells Fargo account ending in 4392 to execute a wire transfer in the amount of $26,000.00 into a Maybank account ending in 8633.

16. On or about April 18, 2012, **Animasaun** caused UMB to execute a wire transfer in the amount of $38,120.00 from a UMB account ending in 6823 into a Wells Fargo account ending in 4392 without P.D.'s knowledge or authorization.

17. On or about April 18, 2012, **Omolade** caused the holder of the Wells Fargo account ending in 4392 to execute a wire transfer in the amount of $38,000.00 into a Maybank account ending in 8633.

18. On or about April 20, 2012, **Animasaun** caused UMB to execute a wire transfer in the amount of $48,850.00 from a UMB account ending in 6823 into a Wells Fargo account ending in 4392 without P.D.'s knowledge or authorization.

19. On or about April 20, 2012, **Omolade** caused the holder of the Wells Fargo account ending in 4392 to execute a wire transfer in the amount of $47,000.00 into a Maybank account ending in 8633.

20. On or about April 24, 2012, **Animasaun** caused UMB to execute a wire transfer in the amount of $49,630.00 from a UMB account ending in 6823 into a Wells Fargo account ending in 4392 without P.D.'s knowledge or authorization.

21. On or about April 24, 2012, **Omolade** caused the holder of the Wells Fargo account ending in 4392 to execute a wire transfer in the amount of $46,000.00 into a Maybank account ending in 8633.

22. On or about April 27, 2012, **Animasaun** caused UMB to execute a wire transfer in the amount of $37,721.00 from a UMB account ending in 6823 into a Wells Fargo account ending in 4392 without P.D.'s knowledge or authorization.

23. On or about April 30, 2012, **Omolade** caused the holder of the Wells Fargo account ending in 4392 to execute a wire transfer in the amount of $37,000.00 into a Maybank account ending in 8633.

24. On or about April 30, 2012, **Animasaun** caused UMB to execute a wire transfer in the amount of $86,190.00 from a UMB account ending in 6823 into a Wells Fargo account ending in 4392 without P.D.'s knowledge or authorization.

25. On or about May 2, 2012, **Omolade** caused the holder of the Wells Fargo account ending in 4392 to execute a wire transfer in the amount of $43,000.00 into a Maybank account ending in 8633.

26. On or about May 2, 2012, **Omolade** caused the holder of the Wells Fargo account ending in 4392 to execute a wire transfer in the amount of $43,000.00 into a CIMB account ending in 5523.

27. On or about June 8, 2012, **Animasaun** and other co-conspirators caused Austin Bank to execute a wire transfer in the amount of $59,981.00 from an Austin Bank account ending in 135 into a Wells Fargo account ending in 4392 without C.E.'s knowledge or authorization.

28. On or about June 11, 2012, **Omolade** caused the holder of the Wells Fargo account ending in 4392 to execute a wire transfer in the amount of $59,000.00 into a CIMB account ending in 5523.

29. On or about June 12, 2012, **Animasaun** and other co-conspirators caused Austin Bank to execute a wire transfer in the amount of $20,900.00 from an Austin Bank account ending in 135 into a Wells Fargo account ending in 4392 without C.E.'s knowledge or authorization.

30. On or about June 13, 2012, **Omolade** caused the holder of the Wells Fargo account ending in 4392 to execute a wire transfer in the amount of $21,000.00 into a Maybank account ending in 8633.

31. On or about June 15, 2012, **Animasaun** caused Northern Trust to execute a wire transfer in the amount of $46,800.00 from a Northern Trust account ending in 4669 into a Wells Fargo account ending in 4392 without D.B.'s knowledge or authorization.

32. On or about June 18, 2012, **Omolade** caused the holder of the Wells Fargo account ending in 4392 to execute a wire transfer in the amount of $46,000.00 into a Maybank account ending in 8633.

All in violation of 18 U.S.C. § 1349.

COUNTS 2-3

Violation: 18 U.S.C. §§ 1344 and 2 (Bank Fraud and Aiding and Abetting)

1. The General Allegations section of this indictment and paragraphs 1-11 of Count 1 of this indictment are realleged and incorporated by reference as though fully set forth herein, as constituting and describing the defendants' scheme and artifice to obtain money and property from a financial institution by means of materially false and fraudulent pretenses, representations, and promises.

Acts in Execution of the Scheme and Artifice

2. On or about the dates specified as to each count below, in the Eastern District of Texas and elsewhere, for the purpose of executing and attempting to execute the above-described scheme and artifice to obtain money, funds, assets, securities, and other property owned by and under the custody and control of an insured financial institution by means of materially false and fraudulent pretenses, representations, and promises, the defendants, **Fawaz Olarenwaju Animasaun a/k/a Richardson6567 a/k/a Lanray Larry a/k/a Larry Hoover a/k/a Slim Husstle Olanraywaju** and **Idowu Temitope Omolade a/k/a Clickidonline a/k/a ID a/k/a Highdee a/k/a Michael Chernick a/k/a Chernick.Michael**, acting in concert with and aided and abetted by each other and others known and unknown to the Grand Jury, knowingly caused Austin Bank to execute wire transfers in the amounts specified as to each count below from an Austin Bank account ending in 135 into the bank account specified below without the knowledge or authorization of the authorized account holder, C.E.:

Count	Date	Amount	Bank Account Receiving Wire Transfer
2	June 8, 2012	$59,981.00	Wells Fargo account ending in 4392
3	June 12, 2012	$20,900.00	Wells Fargo account ending in 4392

All in violation of 18 U.S.C. §§ 1344 and 2.

COUNTS 4-5

Violation: 18 U.S.C. §§ 1028A and 2 (Aggravated Identity Theft and Aiding and Abetting)

1. Paragraphs 1 and 2 of Counts 2-3 of this indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about the dates specified as to each count below, in the Eastern District of Texas, and elsewhere, the defendants, **Fawaz Olarenwaju Animasaun a/k/a Richardson6567 a/k/a Lanray Larry a/k/a Larry Hoover a/k/a Slim Husstle Olanraywaju** and **Idowu Temitope Omolade a/k/a Clickidonline a/k/a ID a/k/a Highdee a/k/a Michael Chernick a/k/a Chernick.Michael**, acting in concert with and aided and abetted by each other and others known and unknown to the Grand Jury, did, without lawful authority, knowingly use, a means of identification of another person, that is, a name, during in and relation to a felony enumerated in 18 U.S.C. § 1028A(c), that is, bank fraud, a violation of 18 U.S.C. § 1344:

Count	Date	Name
4	June 8, 2012	C.E.
5	June 12, 2012	C.E.

All in violation of 18 U.S.C. §§ 1028A and 2.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE
Pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(2)(A) and 28 U.S.C. § 2461(c)

1. The allegations contained in Counts 1 through 3 of this indictment are realleged and incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants have an interest.

2. Upon conviction of any violation of 18 U.S.C. § 1349, the defendants, **Fawaz Olarenwaju Animasaun a/k/a Richardson6567 a/k/a Lanray Larry a/k/a Larry Hoover a/k/a Slim Husstle Olanraywaju** and **Idowu Temitope Omolade a/k/a Clickidonline a/k/a ID a/k/a Highdee a/k/a Michael Chernick a/k/a Chernick.Michael**, shall forfeit to the United States any property, real or personal, that constitutes or is derived from proceeds traceable to a violation of any offense constituting "specified unlawful activity," or a conspiracy to commit such offense, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

3. Upon conviction of any violation of 18 U.S.C. § 1344, the defendants, **Fawaz Olarenwaju Animasaun a/k/a Richardson6567 a/k/a Lanray Larry a/k/a Larry Hoover a/k/a Slim Husstle Olanraywaju** and **Idowu Temitope Omolade a/k/a Clickidonline a/k/a ID a/k/a Highdee a/k/a Michael Chernick a/k/a Chernick.Michael**, shall forfeit to the United States any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of the violation, pursuant to 18 U.S.C. § 982(a)(2)(A).

4. The property which is subject to forfeiture, includes but is not limited to the following:

A money judgment in the amount of $930,737.60, which represents proceeds of the offense.

5. Pursuant to 21 U.S.C. § 853(p), as incorporated by reference by 18 U.S.C. § 982(b), if any of the forfeitable property, or any portion thereof, as a result of any act or omission of the defendants:

a. Cannot be located upon the exercise of due diligence;

b. Has been transferred, or sold to, or deposited with a third party;

c. Has been placed beyond the jurisdiction of the Court;

d. Has been substantially diminished in value; or

e. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek the forfeiture of other property of the defendants up to the value of the above-described forfeitable properties, including, but not limited to, any identifiable property in the names of **Fawaz Olarenwaju Animasaun a/k/a Richardson6567 a/k/a Lanray Larry a/k/a Larry Hoover a/k/a Slim Husstle Olanraywaju** and **Idowu Temitope Omolade a/k/a Clickidonline a/k/a ID a/k/a Highdee a/k/a Michael Chernick a/k/a Chernick.Michael.**

6. By virtue of the commission of the offenses alleged in this indictment, any and all interest the defendants have in the above-described property is vested in the

United States and hereby forfeited to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(2)(A) and 28 U.S.C. § 2461(c).

All pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(2)(A) and 28 U.S.C. § 2461(c), and the procedures set forth at 21 U.S.C. § 853, as made applicable through 18 U.S.C. § 982(b)(1).

A TRUE BILL

[signature]

GRAND JURY FOREPERSON

6/15/16

Date

JOHN M. BALES
UNITED STATES ATTORNEY

[signature]

NATHANIEL C. KUMMERFELD
ASSISTANT UNITED STATES ATTORNEY

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 6:16CR___
	§	JUDGE ______
FAWAZ OLARENWAJU ANIMASAUN (01)	§	
a/k/a RICHARDSON6567	§	
a/k/a LANRAY LARRY	§	
a/k/a LARRY HOOVER	§	
a/k/a SLIM HUSSTLE OLANRAYWAJU	§	
IDOWU TEMITOPE OMOLADE (02)	§	
a/k/a CLICKIDONLINE	§	
a/k/a ID	§	
a/k/a HIGHDEE	§	
a/k/a MICHAEL CHERNICK	§	
a/k/a CHERNICK.MICHAEL	§	

NOTICE OF PENALTY

COUNT 1

VIOLATION: 18 U.S.C. § 1349
Conspiracy to Commit Bank Fraud

PENALTY: Imprisonment of not more than thirty (30) years; the greater of a fine not to exceed $1,000,000, a fine not to exceed two times the gross gain to the Defendant, or a fine not to exceed two times the loss to the victim, or both such imprisonment and fine; and a term of supervised release of not more than five (5) years.

SPECIAL ASSESSMENT: $100.00

COUNTS 2-3

VIOLATION: 18 U.S.C. §§ 1344 and 2
Bank Fraud and Aiding and Abetting

PENALTY: Imprisonment of not more than thirty (30) years; the greater of a fine not to exceed $1,000,000, a fine not to exceed two times the gross gain to the Defendant, or a fine not to exceed two times the loss to the victim, or both such imprisonment and fine; and a term of supervised release of not more than five (5) years.

SPECIAL ASSESSMENT: $100.00 each count

COUNTS 4-5

VIOLATION: 18 U.S.C. §§ 1028A and 2
Aggravated Identity Theft and Aiding and Abetting

PENALTY: Imprisonment of not less than two (2) years and a fine of $250,000 to be followed by not more than one (1) year supervised release. This sentence is to run consecutively to any other sentence imposed. A person convicted of a violation of this section shall not be placed on probation.

SPECIAL ASSESSMENT: $100.00 each count